

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KEITH JOHNSON,)	
)	No. 08 C 1526
Plaintiff,)	
)	
v.)	JUDGE ST.EVE
)	
CITY OF CHICAGO, ILLINOIS, CHICAGO)	
POLICE OFFICER V.R. STINAR, Star No. 4017,)	Magistrate Judge Schenkier
CHICAGO POLICE OFFICER L. PIERRI,)	
Star No. 10956,)	
)	
Defendants.)	

**CITY OF CHICAGO’S AGREED MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFF’S COMPLAINT**

Defendant City of Chicago ("City"), by its attorney, Mara S. Georges, Corporation Counsel for the City of Chicago, respectfully moves for an extension of time to June 6, 2008 to answer or otherwise plead in response to Plaintiff’s complaint. In support of this motion, the City states the following:

1. Plaintiff filed his complaint on or about March 14, 2008. The City Clerk’s Office was served with Plaintiff’s complaint on or about March 25, 2008.
2. Undersigned counsel for the City was assigned the case on or about May 5, 2008, the first opportunity that undersigned counsel had to review Plaintiff’s complaint.
3. The Office of the Corporation Counsel and the Chicago Police Department are still in the process of investigating the allegations in Plaintiff’s complaint and compiling the pertinent records.
4. This motion is the City’s first request for an extension of time to answer or otherwise plead. This request is made not to delay the proceedings but rather to allow the City to

respond properly to the allegations in Plaintiff's complaint.

5. One of Plaintiff's attorneys, Josh Friedman, told undersigned counsel in a telephone conversation on May 7, 2008 that he has no objection to the City's request for an extension of time to answer or otherwise plead.

WHEREFORE, Defendant City of Chicago respectfully requests that it be given an extension of time to June 6, 2008 to answer or otherwise plead in response to Plaintiff's complaint; and for any other relief that this Honorable Court deems proper.

Respectfully submitted,

MARA S. GEORGES
Corporation Counsel
City of Chicago

BY: /s/ Thomas J. Aumann
THOMAS J. AUMANN
Assistant Corporation Counsel

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CERTIFICATE OF SERVICE

I hereby certify that I have caused true and correct copies of the above and foregoing **Notice of Motion and City of Chicago's Agreed Motion for Extension of Time to Answer or Otherwise Plead to Plaintiff's Complaint** to be served upon Jeffrey B. Granich at jeffreygranich@mac.com and Josh Friedman at josh.friedman@comcast.net, via electronic mail, on this 8th day of May, 2008.

/s/ Thomas J. Aumann
THOMAS J. AUMANN
Assistant Corporation Counsel